Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Application by New York Telephone)	
Company (d/b/a Bell Atlantic -)	
New York), Bell Atlantic)	Docket No. 99-295
Communications, Inc., NYNEX Long)	
Distance Company, and Bell Atlantic)	
Global Networks, Inc., for)	
Authorization To Provide In-Region,)	
InterLATA Services in New York)	

COMMENTS OF MCI WORLDCOM, INC.

APPENDIX VOLUME I

Joint Declaration of Sherry Lichtenberg and John Sivori

MCI WORLDCOM, INC. COMMENTS

APPENDIX
TABLE OF CONTENTS

Declarations

TAB	DESCRIPTION	
	DECLARANT	**SUBJECT**
	VOLUME I	
A	Sherry Lichtenberg and John Sivori	Operations Support Systems
	VOLUME II	
B	Annette Guariglia	DSL-based Services
C	George S. Ford and John D. Jackson	Performance Measurements
D	Karen A. Kinard	Performance Measurements
E	John G. Donoghue and Ronald J. McMurtrie	Competitive Requirements
F	Robert A. Mercer	Public Interest
G	T. Randolph Beard and John W. Mayo	Public Interest

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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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OFFICE OF THE SECRETARY

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JOINT DECLARATION OF
SHERRY LICHTENBERG and JOHN SIVORI
on Behalf of MCI WorldCom, Inc.

Based on our personal knowledge and on information learned in the course of our

duties, we, Sherry Lichtenberg and John Sivori, declare as follows:

1.   My name is Sherry Lichtenberg. I am Senior Manager for Product

Development for MCI WorldCom. My duties include designing, managing, and implementing

MCI WorldCom's local telecommunications services to residential customers on a mass market

basis in New York and nationwide, including operations support systems and facilities testing. I

have eighteen years experience in the telecommunications market, three years with MCI

WorldCom and fifteen years with AT&T. Prior to joining MCI WorldCom, I was Pricing and

Proposals Director for AT&T Government Markets, Executive Assistant to the President, and

Staff Director for AT&T Government Markets.

2.   My name is John Sivori. I am Senior Manager in MCI WorldCom's

Information Technology Organization. My duties include the planning and implementation of

electronic interfaces for pre-ordering and ordering operations in support of MCI WorldCom's

entry into local telecommunications markets in the region served by Bell Atlantic. From 1986

through 1996, I was a member of the Telecommunications Industry Forum Executive Board, and

served as chairman of the TCIF Electronic Data Interchange Committee and the TCIF Electronic

Commerce Committee. Before joining MCI WorldCom, I was the Director of Electronic

Commerce in support of the Deputy Secretary of Defense - Acquisition Reform for the United

States Department of Defense. Prior to that time, I worked for Bell Atlantic, AT&T, and

Western Electric in various positions. I have thirty years of experience in the

telecommunications industry, with over fifteen years experience in planning, implementing, and

managing large scale, integrated computer systems. I have been directly involved in the

development of telecommunications industry standards.

3.   The purpose of this Joint Declaration is to respond to the New York

Telephone Company's ("Bell Atlantic-New York" or "BA-NY") contentions that it is today

providing timely, reliable, nondiscriminatory access to its Operations Support Systems ("OSS")

functions. In this Joint Declaration, we will explain the key deficiencies remaining with BA-

NY's OSS systems, interfaces, and processes and the ways in which those deficiencies are

hampering MCI WorldCom's efforts to compete in the local markets in New York.

4.   MCI WorldCom has extensive first-hand experience with BA-NY's OSS

and is in a unique position to discuss both its deficiencies and the areas in which BA-NY has

shown some real improvement. MCI WorldCom first began trying to use resale in May 1997 as

a transitional entry mechanism as it built out its own facilities and worked through the problems

in getting nondiscriminatory access to unbundled network elements ("UNEs"). By March 1988,

however, it had become clear that BA-NY's resale pricing, OSS deficiencies, and other barriers

to competition would not permit MCI WorldCom to rely on resale even in the short term. MCI

WorldCom, then, began focusing on providing local service via combinations of unbundled

network elements or "UNE-platform" service.[1/] In December 1998, MCI WorldCom began

offering UNE-platform service to residential customers in the New York City metropolitan area,

and in February 1999, MCI WorldCom expanded its launch statewide. MCI WorldCom also

provides facilities-based local service to business customers. This Declaration focuses primarily

on MCI WorldCom's experience with OSS for residential, UNE-platform customers.

     5.   MCI WorldCom is not asking for perfection. Rather, we are asking for

sufficient access to OSS to allow MCI WorldCom to compete on a level playing field with BA-

NY. With OSS, "almost ready" is not good enough. With prodding from the New York Public

Service Commission ("NYPSC") and the Department of Justice ("DOJ"), BA-NY has made

great strides over the past several months and has provided adequate OSS access to allow MCI

WorldCom to enter the local markets in New York at limited volumes. BA-NY is not, however,

providing adequate OSS access to sustain a full scale commercial launch by a competitor.

     6.   In order to open the markets to true competition, BA-NY must address

serious deficiencies in three critical areas. BA-NY must develop and implement an EDI-based

interface for the basic pre-ordering subfunctions that can support and sustain actual commercial

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[1/]   "UNE-platform" refers to the provision of service by leasing a complete, pre-assembled combination of network elements. See In re Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket No. 96-98, First Report and Order, 11 F.C.C.R. 15499, ¶¶ 317-341 (1996) ("Local Competition Order").

operations for competitive local exchange carriers ("CLECs"). For the reasons discussed below, the fact that the third-party testers in this case were able to build a test interface based on EDI does not show that BA-NY can support an EDI interface in production. BA-NY must also improve its flow-through rates for order processing. Today, just over half of CLEC orders are being processed without manual intervention. Finally, BA-NY must demonstrate that can and will adhere to reasonable change management practices, including providing timely and adequate notice and documentation, giving due consideration to CLEC input on new releases, and providing immediate notice of unplanned outages and complete explanations for problems after they have been addressed. These are the areas that still require attention from BA-NY.

7.   This Joint Declaration is in two parts. In Part I, we present a general background on OSS functions, their development, and the role they play in providing local exchange service. In addition, we outline the history of OSS development and implementation in New York, including the relevant regulatory proceedings and third-party testing. In Part II, we explain the ways in which BA-NY is still failing to provide adequate, nondiscriminatory access to the basic OSS functions and what remains to be done before BA-NY's OSS can support competitive local service at commercial volumes. We also found many of the assertions made in the Joint Declaration of Stuart Miller and Marion C. Jordan (Compliance with Operations Support Systems Requirements) (BA-NY App. A, Vol. 2) ("Miller & Jordan Decl.") to be incomplete, inaccurate, and, in some cases, misleading. We have responded to and clarified matters discussed in that Declaration where appropriate.

I.   Introduction and Overview.

A.   Automated Access to the Basic Operations Support Systems and Functions is Critical to a CLEC's Ability to Compete.

8.   Operations support systems are all of the systems, databases, business

processes, and personnel needed to ensure that a local exchange carrier can satisfy the needs and

expectations of its customers. As one industry publication has described it, "OSS includes

everything that runs or monitors the [telecommunications] network . . . but is not actually the

network itself."[2] It is customary and useful to distinguish among five basic OSS systems: pre-

ordering, ordering, provisioning, billing, and repair and maintenance.

9.   In order to access these basic OSS functions, a CLEC must establish a

connection with the ILEC to exchange information and conduct transactions. In theory, the

connection and processing of these transactions could be manual or automated. A manual

connection means that the CLEC's access is mediated in some way by human intervention. A

CLEC might, for example, place orders with an ILEC via facsimile or monitor the status of

orders by placing a phone call to the ILEC. Even where a CLEC is able to transmit orders

electronically, manual intervention may occur on the CLEC's side before the order is placed or

on the ILEC's side during processing. If a CLEC cannot, for example, integrate its pre-ordering

and ordering functions with each other and with its own back end systems, then its

representatives will be forced to manually rekey the pre-order information when creating orders.

Or, the ILEC may have to manually intervene and process electronic CLEC orders if the ILEC's

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2/   Ed Feingold, Making Sense of OSS, Billing World, at 21, 22 (Jan. 1997).

systems are not properly designed to permit the orders to flow-through to its downstream

systems.

10.   Manual access arrangements are simply not compatible with MCI

WorldCom's needs as a new entrant. Every manual intervention causes delay, sometimes

substantial delay, and creates a significant risk of error. By relying on manual intervention, an

ILEC makes its competitors dependent on the hours, efficiency, and accuracy of its own

employees--including their incentive or lack of incentive to be efficient and accurate. Manual

arrangements also increase a CLEC's costs of managing and monitoring the ILEC manual

processing. As this Commission has recognized, reliance on manual processing consistently

results in poor ILEC performance as commercial volumes increase.[3/] Accordingly, solutions that

require manual intervention are not acceptable in either the short or long term.

11.   Automated connectivity or access, on the other hand, means that the

information is exchanged and transactions are conducted between the CLEC and ILEC

3/   See, e.g., In re Application of BellSouth Corporation, BellSouth Telecommunications,
Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in
Louisiana, CC Docket No. 98-121, Memorandum Opinion and Order, 13 F.C.C.R. 20599 ¶110
(Memorandum Opinion and Order, 13 F.C.C.R. 539 (1998) ("Second BellSouth Louisiana
Order"); In re Application of BellSouth Corporation, et al. Pursuant to Section 271 of the
Communications Act of 1934, as amended, to Provide In-Region, InterLATA Services in South
Carolina, CC Docket No. 97-208, Memorandum Opinion and Order, 13 F.C.C.R. 539 ¶ 107
(1997) ("BellSouth South Carolina Order"); In re Application of BellSouth Corporation, et al.
Pursuant to Section 271 of the Communications Act of 1934, as amended, to Provide In-Region,
InterLATA Services in Louisiana, CC Docket No. 97-231, Memorandum Opinion and Order,
13 F.C.C.R. 624 ¶ 28 (1998) ("First BellSouth Louisiana Order"); In re Application of Ameritech
Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, to Provide
In-Region, InterLATA Services in Michigan, CC Docket No. 97-137, Memorandum Opinion and
Order, 12 F.C.C.R. 20543 ¶ 173 (Aug. 19, 1997) ("Ameritech Michigan Order").

computers, without manual intervention. This can be done through a variety of different electronic interfaces that differ widely in degrees of sophistication and utility.

12.   The most sophisticated type of automated access is electronic bonding. Electronic bonding provides a system-to-system or application-to-application connection that allows new entrants to approximate the same real-time access to the ILEC's OSS functions that the ILEC itself enjoys. From the customer's perspective, interactions with a CLEC that has electronically bonded to the ILEC are nearly indistinguishable from interactions with the ILEC. Furthermore, because electronic bonding links the CLEC's existing OSS systems to the ILEC's, the CLEC does not need to develop new systems to transact business with the ILEC.

13.   A less sophisticated automated arrangement involves the transfer of data between computer systems in batches. These "batch transfer" solutions work much like electronic mail, in which the sender transmits the message to a holding facility outside of his own computer systems, and the recipient polls the holding facility to retrieve the message. File Transfer Protocol ("FTP") is perhaps the classic batch interface, and it transmits large amounts of data at scheduled, periodic intervals. A second common batch transfer interface is Electronic Data Interchange ("EDI"). While batch transfer solutions do not operate in real-time, they are application-to-application interfaces and, if properly structured, they can provide very close to real-time processing.

14.   Far less sophisticated "automated" interfaces include dedicated access arrangements, the most common of which in the telecommunications context is the Graphical User Interface ("GUI"). With this arrangement, a CLEC has a computer terminal that gives it

direct access to the ILEC's systems. This is not an application-to-application interface, however,

because the ILEC's systems are not connected to the CLEC's systems. The GUI merely provides

a window into the ILEC's systems. When a CLEC representative obtains information from the

ILEC via the GUI, it must retype that information into the CLEC's systems. GUIs are

notoriously cumbersome to use, and because they are not application-to-application interfaces,

the CLEC cannot redesign the desktop screens to make them more user friendly and efficient.

15.   Another important distinction is between proprietary interfaces, which

employ business rules and data format specifications particular to a given ILEC, and interfaces

based on the business rules and specifications developed by the relevant national standards

bodies or industry fora. The Alliance for Telecommunications Industry Solutions ("ATIS"),

which is accredited by the American National Standards Institute ("ANSI"), is the umbrella

organization that oversees the relevant standard-setting committees and subcommittees for local

service interfaces. For pre-ordering, ordering, provisioning, and billing, the key industry

committees are the Telecommunications Industry Forum ("TCIF") and the Ordering and Billing

Forum ("OBF"), which operates under the Carrier Liaison Committee ("CLC"). For repair and

maintenance, the T1M1 Subcommittee ("T1M1") of the Committee T1 for Telecommunications

("T1") sets the standards.

16.   It is critically important that the ILECs develop and implement interfaces

that adhere as closely as possible to the standards and guidelines developed in the industry fora

for at least two reasons. First, for CLECs that intend to compete in markets across the country, it

would be prohibitively expensive to have to develop, implement, and maintain different

interfaces for each ILEC region. In addition to increasing development and maintenance costs,

having different regional interfaces introduces significant operational costs for training and

supporting different sales and customer service groups for each region. This is why most ILECs

try to unify their own systems. A nationwide CLEC like MCI WorldCom must be able to realize

similar economies. It can only do so, however, if the several large ILECs conform to nationally

standardized interfaces and formats.

17.   Second, the industry fora have been established to determine which

interfaces, rules, and specifications are reasonably necessary and practical for supporting entry

into local markets. Participants in these fora include representatives from every major ILEC

(including Bell Atlantic) as well as representatives from the CLEC community (including MCI

WorldCom). Thus, the decisions made in these fora are made by the same companies that have

to implement and use these interfaces in the real world.

B.   The Burden Rests with BA-NY to Prove that the CLECs Have Nondiscriminatory Access to the Key OSS Functions.

18.   The fundamental importance to a CLEC of having nondiscriminatory

access to the ILEC's OSS is well established. The Commission has emphasized that

"nondiscriminatory access to these systems, databases, and personnel is integral to the ability of

competing carriers to enter the local exchange market and compete with the incumbent LEC.

New entrants must be able to provide service to their customers at a quality level that matches

the service provided by the incumbent LEC to compete effectively in the local exchange market."

Second BellSouth Louisiana Order ¶ 83; see also Ameritech Michigan Order ¶ 129; BellSouth

South Carolina Order ¶ 82.

19.   Because of the importance of OSS, the burden rests with the ILEC to show

that CLECs have access of the same quality, reliability, accuracy, and timeliness to the same

OSS functionalities as the ILEC and that the ILEC can sustain the requisite level of performance

while supporting commercial volumes of CLEC transactions. The Commission has held that in

order to carry this burden, an ILEC must show both that CLEC access to OSS is

nondiscriminatory on its face and that its OSS functions are operationally ready as a practical

matter. Second BellSouth Louisiana Order ¶ 85.

20.   The nondiscrimination requirement means simply that "the BOC provide

the same access to competing carriers that it provides to itself." Ameritech Michigan Order ¶

143. Thus, in terms of functionality, timeliness, accessibility, reliability, and overall quality, the

systems available to CLECs must be indistinguishable from the ILEC's. More specifically,

where the ILEC employs automated, flow-through systems, it must provide the same automated,

flow-through access to the CLECs. Ameritech Michigan Order ¶ 137; BellSouth South Carolina

Order ¶ 107. And, where the ILEC is able to integrate its pre-ordering and ordering functions so

as to eliminate the need for its representatives to rekey information, the ILEC must provide the

CLECs with the same capability. Second BellSouth Louisiana Order ¶ 96.

21.   The reason for this is clear. In practice, manual intervention on either side

of the ILEC/CLEC interfaces inevitably results in errors and delays, which limit the number of

transactions the CLEC can accurately process and, thus, limit the CLEC's ability to support

increasing numbers of customers. An ILEC could, of course, commit sufficient staff and

resources to manual processing to create the illusion of adequate OSS for a limited period of time

and at relatively small volumes of CLEC orders. But this illusion could not be sustained over time or at commercial volumes of orders.

22.   In order to achieve the requisite integration of pre-ordering and ordering as well as the necessary real-time or near real-time pre-ordering response and processing times, the ILEC must develop and implement application-to-application interfaces for pre-ordering and ordering. Experience has shown that GUI interfaces are too slow and cumbersome, and automated integration of these key OSS functions with a CLEC's back end systems is simply not possible with these rudimentary interfaces.

23.   In recognition of the need for application-to-application solutions, the industry standards bodies have adopted EDI as the standard for pre-ordering and ordering. In addition, in order the ensure reliable, near real-time access for pre-ordering, the industry has agreed that Transfer Control Protocol/Internet Protocol ("TCP/IP") would serve as the transport protocol, and Secured Socket Layer 3 ("SSL3") would be the security protocol for EDI for pre-ordering. As discussed above, if a CLEC is to compete on a national scale in local markets, these are the interfaces that an ILEC must be required to develop and implement.

24.   Although having the proper back office systems, interfaces, and processes in place is a necessity, it is not sufficient to demonstrate that an ILEC is actually able to provide nondiscriminatory access to its OSS. There must be sufficient experience with the OSS to show that it is operationally ready to support commercial volumes of traffic. The ILEC must show that its OSS functions "are actually handling current demand and will be able to handle reasonably foreseeable demand volumes." Ameritech Michigan Order ¶ 138. BA-NY, for example, has

made repeated claims that its OSS was operationally ready over the past two years, only to be

proven wrong on each occasion either by the experience of CLECs in attempting to provide local

service or by the results of independent third-party testing or both. The clear lesson is that

promises to remedy particular deficiencies or to make needed improvements in the future (even

when made in good faith) are no substitute for demonstrated operational readiness.

25.   While substantial progress has been made towards achieving

nondiscriminatory access to BA-NY's OSS, both MCI WorldCom's actual experience in the

marketplace and the independent assessment of third-party testers show that BA-NY is not yet

capable of providing adequate OSS access. As a result, new local carriers like MCI WorldCom

remain at a disadvantage and cannot compete effectively with BA-NY in providing local service

in New York.

C.   A Brief History of OSS Development in New York.

**1.   BA-NY First Claimed to be Providing Adequate OSS Access Three
Years Ago.**

26.   BA-NY (then NYNEX) first made the claim that it had fully implemented

the competitive checklist and was providing nondiscriminatory OSS access for unbundled UNEs

and resale in February 1997--almost three years ago. BA-NY contended at that time that it was

already providing "competitors [OSS] service equal--an in some respects, superior--to what it

provides itself" for UNEs and that the few deficiencies that did exist for resale were "relatively

minor" and did not pose a barrier to competition. Ruling Concerning the Status of the Record,

Case No. 97-C-0271, at 20, 25 (NYPSC July 8, 1997) (BA-NY App. C, Tab 111). The record

developed by the NYPSC in response to BA-NY's initial filing demonstrated conclusively,

however, that BA-NY had not even made "a prima facie case for parity of operations support

systems" for UNEs or resale. July 1997 Ruling, at 22, 32-33.

27.   BA-NY tried again in late 1997, filing a lengthy supplemental Section 271

petition, including evidence from purported independent testing by Coopers & Lybrand. BA-NY

asserted that it had finally "fulfilled its part of the historic bargain embodied in the

Telecommunications Act of 1996" and opened the local markets to competition. Supplemental

Petition of BA-NY, at 1 (NYPSC Nov. 6, 1997) (BA-NY App. C, Tab 122). While the NYPSC

never formally ruled on this supplemental petition, the evidence adduced by MCI WorldCom and

the other CLECs clearly belied BA-NY's claims and thoroughly discredited the alleged third-

party test results, see e.g., MCI WorldCom Phase II Opening Brief (NYPSC Jan. 6, 1998)

(BA-NY App. C, Tab 291); Initial Brief of AT&T Communications of New York, Inc. (NYPSC

Jan. 5, 1998) (BA-NY App. C, Tab 282).

**2.   The OSS Collaboratives and BA-NY's Pre-Filing Statement Provided
         the Foundation for OSS Development in New York.**

28.   Meanwhile, BA-NY's claims to the contrary notwithstanding, the NYPSC

had recognized the obvious deficiencies of BA-NY's interfaces for pre-ordering and ordering

UNEs. Moreover, it had become clear to MCI WorldCom and the other larger CLECs that BA-

NY's pricing for resold service would not support competition and that if there was to be

competition (especially in the local residential markets), it would have to be with competitively

priced UNE-platform service. Against this background, in late October 1997, the NYPSC and

the parties commenced an intensive "OSS Collaborative" process to develop the necessary

electronic interfaces. The OSS Collaborative initially focused on developing an EDI interface

for ordering UNEs and was later expanded to encompass other OSS issues.

29.   Ultimately, the parties were able to make substantial progress in the OSS

Collaborative, but, even with the extensive involvement of the NYPSC, the pace was slow. BA-

NY frequently refused to address key issues as matters of company "policy." For example, for

months BA-NY would not discuss OSS for UNE-platform combinations. Where BA-NY agreed

to discuss an issue, BA-NY often failed to provide the parties with sufficient documentation to

enable the CLECs to evaluate the offerings in a meaningful way. Where documentation was

available, BA-NY was in many cases not able to remedy even obvious problems, such as

inconsistencies between their interface specifications and business rules.

30.   Seeking to bring closure to the Collaborative, the NYPSC announced in

March 1998 that it would sanction and supervise a third-party test of BA-NY's OSS. The

NYPSC retained KPMG Peat Marwick ("KPMG") to develop the test plan, oversee the testing,

and report the results. Another third-party, Hewlett Packard ("HP") was retained as a "test"

CLEC to develop its own OSS interfaces, based on the interface specifications and business rules

established during the Collaboratives for pre-ordering and ordering.

31.   Close on the heels of this announcement, BA-NY issued a Pre-Filing

Statement on April 6, 1998, in which BA-NY made specific commitments to the NYPSC, this

Commission, and to those CLECs investing in local market entry in New York. BA-NY Pre-

Filing Statement (Apr. 6, 1998) (BA-NY App. C, Tab 403). While BA-NY's pre-filing

commitments are not 271 requirements per se, they are relevant to this Commission review of

BA-NY's application. By agreeing to these commitments, BA-NY acknowledged the

importance of these particular items to CLEC operations and the reasonableness of CLEC

demands that they be met.

           32.   Among other things, BA-NY promised the following in its Pre-Filing

Statement regarding OSS:

> •To develop and implement "application-to-application interfaces for pre-ordering and ordering, which will allow CLECs to tie their OSS directly to Bell Atlantic-NY's OSS via this interface" and which "will be fully integratable for the pre-ordering and ordering functions." BA-NY Pre-Filing Statement at 28.

> •To provide the technical support necessary to construct these interfaces and to adhere to reasonable change management processes, including adequate notice and documentation, during their development and implementation. Id. at 30.

> •To maintain "help desks that CLECs can contact for support; the centers will have sufficient hours of operation . . . and will be staffed by an adequate number of persons with the appropriate expertise to provide the necessary support." Id. at 31.

> •To provide "CLECs with the information necessary to format and process their electronic requests so that these requests flow through the interfaces, the transmission links, and into Bell Atlantic-NY's legacy systems as quickly and efficiently as possible." Id. at 30.

> •To provide "order flow through" for the types of orders appearing in Appendices 2 and 3 of the Pre-Filing Statement and "to continue to modify its OSS systems to flow through all but the least frequently requested types of orders at rates which are at parity with the rates at which analogous orders provided by Bell Atlantic-NY's own retail operations flow through." Id. at 31.[4]

4/   Appendix 2 states that, by August 1998, BA-NY would provide flow through for UNE-platform orders for (1) migration of existing account "as is" and (2) migration of existing account "as specified" ("as is" plus or minus the following features): Call Waiting, 3-Way Calling, Call Forwarding, Speed Calling 8 and 30, and Touch Tone; PIC modifications including PIC freeze; LPIC modifications including LPIC freeze; Customer/Company initiated blocking; Remarks data only delete an auxiliary line; Phonesmart; and Call Forwarding II. Appendix 3 does not include

•To "demonstrate that it is able to generate meaningful performance reports." Id. at 32.

•To provide "migration 'as is' and migration 'as specified' as set forth in Appendix 2. Id. at 32.

•To "engage in and provide full cooperation for . . . "carrier-to-carrier testing" of CLEC OSS interfaces before that are introduced into commercial operation. Id. at 32.

•To provide "full cooperation to a third party test of its systems," "[a]s part of the demonstration that it has achieved the standards [set out in the Pre-Filing Statement]." Id. at 33.

33.   While much progress has been made since BA-NY issued these commitments, there is still work to be done on these commitments.

34.   Months before BA-NY issued its Pre-Filing Statement, MCI WorldCom had been seeking an application-to-application alternative to the GUI for pre-ordering. So when BA-NY committed to develop such an interface, MCI WorldCom quickly seized the opportunity to begin direct carrier-to-carrier development with BA-NY. After several months of bilateral efforts between MCI WorldCom and BA-NY, in June 1998, the Commission convened a second Collaborative proceeding to establish the business rules and specifications for an EDI interface for pre-ordering based on the work started by MCI WorldCom and BA-NY. Working on an extremely expedited basis, the parties were able to reach agreement sufficient for BA-NY to release a specification for EDI for preordering, Version 1.9, on July 18, 1998.

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a UNE-platform category but lists additional flow through for, inter alia, Ringmate, partial migrations, and contractual agreements for resale and UNEs.

35.   Close scrutiny of BA-NY by NYPSC Staff and enormous commitments of

time and resources from CLECs resulted in significant progress. Nevertheless, as described

below, many OSS issues remained unresolved and a great deal of work remained to be done

when the Collaboratives closed in May 1998.

3.   KPMG's Third-Party Testing Spurred OSS Development.

36.   In the spring of 1998, the NYPSC retained KPMG and HP to conduct

independent, third-party testing of BA-NY's OSS systems, interfaces, documentation, and

processes. With CLEC input, KPMG designed a detailed test plan, which covered "all stages of

the CLEC-ILEC relationship," including establishing the relationship, performing daily

operations, and maintaining the relationship. KPMG, Bell Atlantic OSS Evaluation Project,

Final Report, Final Version 2.0, at II-2 (Aug. 6, 1999) ("KPMG Final Report") (BA-NY App. C,

Tab 916). The testing covered all of the major OSS functions (i.e., pre-ordering, ordering,

provisioning, repair and maintenance, and billing) as well as BA-NY's change management

practices, CLEC support processes, and carrier-to-carrier testing capabilities and involved each

of the current service delivery methods (i.e., resale, UNEs, and UNE-platform). Id.

37.   With MCI WorldCom's full support, the Commission structured the

testing based on a "military-style test philosophy," meaning that KPMG would highlight

problems and deficiencies it discovered during testing and give BA-NY the opportunity to

address and correct them on an ongoing basis. KPMG Final Report, at II-4. When KPMG

reached an impasse in testing or discovered a serious deficiency in performance, it would issue

an "Exception Report," describing the issue and its likely impact on a CLEC. BA-NY was

permitted to respond in writing and was given an opportunity to remedy the problem. KPMG,

then, would retest the component. If the component worked properly, then KPMG would issue a

written closure report. If not, the process was repeated. As testing drew to a close, however,

KPMG was unable to retest certain deficiencies in BA-NY's OSS. In those cases, KPMG closed

the Exception Reports "in a less than fully satisfied state." Id. at II-5; see also Minutes of

NYPSC Technical Conference, July 28, 1999, Tr. at 3498 ("Closure of an exception was always

meant to mean that the item will not be investigated any further. It does not imply or mean in

any way that the issues raised in the exception had been resolved satisfactorily . . . .") (BA-NY

App. C, Tab 885).

38.   KPMG and HP began trying to construct EDI-based interfaces for pre-

ordering and ordering in the summer of 1998. To aid the effort the NYPSC convened a second

OSS Collaborative, which focused this time on EDI for pre-ordering. At this time, both MCI

WorldCom and the third-party testers were working to implement these interfaces. MCI

WorldCom needed the interfaces to support its launch into local residential markets in New York

in the fall, and KPMG intended to begin testing that summer. BA-NY claimed that its

documentation was accurate and complete and that it had fully implemented EDI interfaces for

pre-ordering and ordering in July 1998, but MCI WorldCom, KPMG, and HP quickly discovered

that BA-NY had overstated its case and that its "systems were not yet ready for production."

KPMG Final Report, at II-8. As KPMG explains, "[w]hile a new CLEC should be expected to

have initial difficulties with its interface, we did not expect BA-NY to release software and

documentation in the condition we encountered." Id. As a result of these problems, it took MCI

WorldCom, KPMG, and HP many weeks to "debug" BA-NY's software. By December 1998,

however, MCI WorldCom was able to launch into production with EDI for ordering, and KPMG

and HP were able to begin testing of that interface.

39.   BA-NY's EDI for pre-ordering was not nearly as successful. Again,

despite BA-NY claims that the pre-ordering documentation it had released in July was complete

and accurate, MCI WorldCom identified hundreds of issues with the documentation. Between

July and September 1998, BA-NY released no fewer than five sets of specifications (i.e., BA-NY

EDI Versions 1.9, 1.9B, 1.9C, 1.9D, 1.9E, and 2.0), each purporting to be final and complete but

each deficient. In the end, MCI WorldCom had to move into production in December 1998

using the GUI for pre-ordering because there seemed no end in sight for pre-ordering EDI

development.

40.   KPMG and HP were eventually able to construct an EDI interface for pre-

ordering for the purposes of third-party testing and were able to begin testing of the interface in

February 1999. MCI WorldCom could not take advantage of this development, however,

because BA-NY afforded KPMG and HP special treatment that BA-NY did not give to CLECs,

including dedicating BA-NY personnel in order to provide information and development

assistance.[5]

41.   KPMG and HP conducted testing of BA-NY's OSS from December 1998

through August 1999. In that time, KPMG opened some 49 Exception Reports, highlighting

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[5]   For a more detailed discussion of the pre-ordering development effort and BA-NY's
special treatment of KPMG and HP see infra ¶¶ 84-96.

deficiencies in every category of BA-NY's OSS. While KPMG has now closed all of these reports, KPMG has made clear that serious deficiencies remain in several key OSS areas. BA-NY's claim that KPMG was satisfied with 850 of 855 test points is misleading. First, BA-NY's numbers do not include the 146 test points that KPMG gave BA-NY only a qualified passing grade. Second, BA-NY's numbers do not account for key areas, like the integration of the pre-ordering and ordering functions, flow-through ordering, and QA testing, where KPMG did not attempt to reproduce and test the real world activities. Third and finally, as KPMG has been careful to explain, "[a] simple numerical counting or averaging of results by result category is misleading and should be avoided." KPMG Final Report, at II-6. The key is to evaluate the test result qualitatively, looking specifically at the areas in which BA-NY has either failed or had difficulties and determining the affect of those failures on the ability of a CLEC to compete effectively. As KPMG found, BA-NY's remaining deficiencies affect crucial OSS areas.

42. KPMG, for instance, encountered major problems with BA-NY's EDI interface for pre-ordering. See KPMG Exception Reports 25, 55 (BA-NY App. C, Tab 535). While BA-NY's documentation has improved, KPMG found that "the quality of subsequent releases still falls short of that required of a CLEC in a production environment." KPMG Final Report, at II-8. KPMG also was concerned that, during testing, BA-NY failed to meet the required standard for pre-ordering response times for all pre-ordering transaction types. Id., P5-3 (satisfied with qualifications), at IV-105.

43. With regard to OSS support, KPMG found serious deficiencies in BA-NY's change management practices, quality assurance ("QA") testing, and help desks. First,

KPMG was not satisfied with BA-NY change management practices. See KPMG Exception

Report 6. KPMG specifically found that BA-NY did not consistently meet the established

intervals for providing notice and documentation for BA-NY initiated changes. KPMG Final

Report, R1-5 (satisfied with qualifications), R1-6 (not satisfied), R2-6 (satisfied with

qualifications), at VII-8. Second, KPMG found BA-NY carrier-to-carrier testing facilities and

procedures completely inadequate. See KPMG Exception Reports 21, 22. KPMG found that

BA-NY's proposed changes would improve BA-NY's testing capabilities but that it would not

have sufficient opportunity to evaluate either BA-NY's temporary or permanent solutions to

these problems before concluding its testing. KPMG Final Report, R2-7, at VII-24. Third,

KPMG found "significant deficiencies in the quality" of BA-NY's help desk documentation and

concluded that "these errors resulted in significant delays" in interface development and in pre-

order and order transaction processing. See KPMG Exception Report 45; KPMG Final Report,

P9-16 (not satisfied), at IV-218.

      44.   As a result of KPMG's "test until you pass" approach, the third-party

testing was more than a static evaluation of the systems, interfaces, and processes that were in

place. It actually spurred affirmative OSS development and led BA-NY to improve its systems,

interfaces, and processes. Under the direction and supervision of the NYPSC, KPMG's testing

process has considerably advanced OSS development in New York, and BA-NY is much closer

today than it was when testing began to being able to provide nondiscriminatory OSS access to

CLECs. As KPMG states, BA-NY is "on the path" to "[c]reating a wholesale business that

focuses on wholesale customer satisfaction, not retail customer competition," KPMG Final

Report, at II-7.

II.   BA-NY Does Not Provide Nondiscriminatory Access to the Basic OSS Functions.

A.   BA-NY Does Not Provide Adequate, Application-to-Application Pre-Ordering Functionality.

45.   Pre-ordering is the process by which a CLEC gathers and verifies the

information needed to place an order for local service. Second BellSouth Louisiana Order ¶ 94.

It is the first step in creating an order for local service so any delays or errors made at the pre-

ordering stage ripple through the process, causing delays and rejected orders down the line. It is

also the first exposure that customers have to the CLEC, which makes it all the more important

that the process run smoothly. As this Commission has recognized, meeting customer

expectations for speed, efficiency, and accuracy is an important element to achieving and

sustaining a competitive position in the market. See Second BellSouth Louisiana Order ¶ 105

(quoting BellSouth South Carolina Order for proposition that a CLEC should not "'appear to be a

less efficient and responsive service provider than its competitor [ILEC]'").

1.   In Order to Compete Effectively, a CLEC Must Have Access to the Basic Pre-Ordering Subfunctions.

46.   In its past 271 orders, the Commission has acknowledged the fundamental

importance of five pre-ordering subfunctions: (1) customer service record ("CSR") information;

(2) street address validation; (3) telephone number information; (4) due date information; and (5)

services and feature information. Second BellSouth Louisiana Order ¶ 94; BellSouth South

Carolina Order ¶ 147; First BellSouth Louisiana Order ¶ 47. A brief description of each of these

key subfunctions follows.

47.   CSR Information. The CSR provides the customer's basic service

information, including the customer's name, service address, telephone number, current service

and features, directory listing, and long distance and intraLATA carriers. This is the information

needed to take and place the customer's order when the customer is migrating from an ILEC to a

CLEC. Without access to the CSR, the CLEC would have to get the information from the

customer himself, which is problematic for several reasons. The customer may not know or

recall certain information, such as which services and features he currently has or the precise

form of his directory listing. Also, while the customer may be able to provide his mailing

address, that address may differ in form or content from the service address that the ILEC uses to

provide service to the customer. Equally important, customers have come to expect their local

carriers to possess this information. In order to compete effectively against the ILEC, a CLEC

must be able to meet these customer expectations just as the ILEC can.

48.   Address Validation. For new customers, no CSR is available so the CLEC

must validate the customer's address independently. Without a complete and valid service

address, the CLEC cannot reserve a telephone number for the customer, schedule a due date for

service, conduct other important pre-ordering inquiries, or create an order for service. In

addition, the address that the CLEC puts on its order must match precisely both in form and

content the address information held by the ILEC for that location or the order will not flow

through the ILEC's systems but either will be rejected or will drop out of the electronic order

flow for manual processing.[6]

49.   <u>Telephone Number Information</u>. The CLEC must be able to select and

reserve a telephone number for the customer during the pre-ordering process. In addition, the

CLEC should be able to return unneeded telephone numbers. The ILEC has these capabilities,

and customers have every right to expect that a CLEC will too.

50.   <u>Due Date Information</u>. The CLEC must be able to determine what dates

are available to migrate a customer's service from the ILEC or, for new customers, when service

will be established for the first time and to reserve that due date. In other words, the CLEC must

be able to establish a reliable due date with the customer for when his new or migrated service

will begin.

51.   <u>Service and Feature Information</u>. The CLEC must be able to determine

which services and features it can offer a customer. The particular switching facilities serving a

customer may not, for example, be able to support certain services and features. Just like the

ILEC, a CLEC must know which services and features are available for which customers.

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[6]   A CLEC must be able to validate addresses based on either the customer's working
telephone number or the customer's address. For customers adding lines to an existing CLEC
account, the CLEC should be able to validate the service address based on the customer's
working telephone number. For new customers, on the other hand, who do not yet have working
telephone numbers, the CLEC must be able to validate the address using the address.

2.   **In Order to Sustain Commercial Volumes, a CLEC Must Have Application-to-Application Access to Each of the Basic Pre-Ordering Subfunctions.**

52.   In addition to having access to the basic pre-ordering information and subfunctions, it is vital for at least two reasons that this access be provided via an application-to-application interface. First, an application-to-application interface is needed in order to conduct the pre-ordering process in real-time or near real-time. Real-time processing is important because the pre-ordering process occurs while the customer is on the line with the CLEC, and any failure or delay in these communications has an immediate negative impact on the CLEC's ability to provide quality service in a timely and efficient manner. Thus, a CLEC's ability to build a satisfied customer base depends in no small part on its having access to a fully functional, application-to-application interface for pre-ordering.

53.   Second, an application-to-application interface for pre-ordering is critical to a CLEC's ability to compete because, without such an interface, the CLEC is unable to integrate the pre-ordering and ordering functions with one another or with its back end systems and databases. When using the GUI, for example, the CLEC representative must access the customer's pre-ordering information via a GUI and then rekey the information into the CLEC's systems and databases for the CLEC's internal use and to complete the service order itself. Such manual intervention has a significant impact on a CLEC's ability to support commercial volumes of orders. The Commission has explained, for instance, that "the additional costs, delays, and human errors likely to result from [not having an integrated pre-ordering/ordering interface] ha[ve] a significant impact on a new entrant's ability to compete effectively in the local exchange

-25-

market and to serve its customers in a timely and efficient manner." Second BellSouth Louisiana

Order ¶ 96; see also id. ¶¶ 94-100 (discussing importance of integrated pre-ordering and ordering

functions).

54.   Finally, another prerequisite to integrating the pre-ordering and ordering

functions is access to parsed CSR information and parsed address validation responses. Parsing

is critical because it separates customer information into identifiable fields (e.g., listed user

name, street number, street name, directional, etc.), rather than having the critical details appear

as part of a single, unfielded data element. The only reliable way to transfer the information

from an unparsed response to the CLEC systems or to automatically populate orders is to retype

the data manually. Inevitably, delay and errors result. The problem is compounded by the fact

that because the CLEC cannot manipulate or reformat the data electronically, the customer

information appears to the CLEC representatives in whatever format the ILEC transmits it. Only

with parsed CSRs and address validation responses can a CLEC control the presentation of the

information to its sales and customer service representatives, load the information effectively

into its databases, or use the information to automatically populate firm service orders.

55.   In sum, in order to compete effectively, MCI WorldCom must have access

to the basic pre-ordering subfunctions and that access must be provided with an industry

standard, EDI-based, application-to-application interface.

3.   BA-NY Does Not Provide Adequate Access to the Basic Pre-Ordering Subfunctions.

56.   After more than a year of intense development work with BA-NY and

millions of dollars invested, MCI WorldCom still does not have application-to-application access

to most of the pre-ordering subfunctions in New York. After experiencing delay after delay in

the development process, MCI WorldCom determined to focus on implementing at least the

parsed CSR and address validation capabilities before the end of the year. In September 1999,

MCI WorldCom implemented parsed CSR, and MCI WorldCom intends to implement a limited

form of address validation before November 1, 1999.[7] The GUI will provide the only access to

the other pre-ordering inquiries, including telephone number reservation, due date availability,

and service and feature availability, until sometime next year.

57.   As a threshold matter, it is important to understand that the fact that

KPMG was able to construct an EDI-based interface for pre-ordering for testing purposes does

not show that BA-NY has provided the necessary documentation and support necessary for MCI

WorldCom or any CLEC to build a working EDI interface for use in a production environment.

First, BA-NY showed substantial favoritism to the third-party testers during the development of

their test interface, cutting MCI WorldCom and the other CLECs out of the process and denying

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[7]   Although MCI WorldCom believes that it will be able to implement an address validation
function before the end of the year, that function will only permit address validation using the
customer's working telephone number. Unfortunately, address validation based on the
customer's address will not possibly be in place before next year. Since new customers do not
have working telephone numbers, this means that MCI WorldCom will not be able to use address
validation for new customers until next year.

them access to the support and documentation being provided to KPMG and HP. For a discussion of the issues surrounding third-party testing, see infra at ¶¶ 88-90.

58.   Second, the interface eventually built and used in the third-party testing was not as robust as is required in production. KPMG did not attempt, for example, to build interfaces with integrated pre-ordering and ordering functions or to integrate its interfaces with back end systems. KPMG did state that it believed that integration was possible in theory, but it is not actually undertake to complete such integration itself. See discussion infra ¶ 97.

59.   Third, because KPMG was only constructing a test interface, its development was not delayed by the need for sophisticated transport and security for the interface. In order to provide the necessary reliability and security for production purposes, however, the industry fora have adopted TCP/IP with SSL3 security as the standard for pre-ordering connectivity. BA-NY delays in developing this basic aspect of pre-ordering access delayed pre-order development several weeks. See discussion infra ¶ 93.

60.   Finally, it is not a trivial matter that KPMG was not able to build its testing interface using BA-NY's documentation. KPMG explains in its Final Report that BA-NY never provided production-quality documentation for EDI for pre-ordering. KPMG Final Report, at II-8. KPMG had to develop the interface based on "trial and error" efforts, in conjunction with special dedicated support from BA-NY. Id. at IV-4 to -5. A "trial and error" approach without adequate final documentation is unacceptable, however, for a company interested in long-term commercial use of the interface. Without complete and accurate documentation, an interface is not reliable enough to support a commercial launch. A CLEC

moving into production without documentation is completely dependent on the skills and

knowledge of the engineers and technicians that built the interface. The CLEC could not update,

repair, or maintain the interface without those particular individuals. This is too precarious a

foundation to support large-scale, long-term commercial operations.

61.   With regard to MCI WorldCom's parsed CSR capability, even that

interface remains unstable; does not return responses in competitive time frames; and is limited

to only certain order types. First, MCI WorldCom is experiencing intermittent outages of the

interface. Since putting the parsed CSR interface into production on September 3, the interface

has failed eleven times. See Bell Atlantic - New York Trouble Tickets, nos. 754776, 762691,

762755, 770826, 772487, 777551, 780431, 780750, 785725, 785972, 787039, appended as

Attachment 1 to this Declaration. MCI WorldCom and BA-NY have not determined the causes

for many of these outages, and they continue to work to stabilize the interface.

62.   Second, BA-NY is not providing parsed CSR responses in competitive

time frames. Under the Carrier-to-Carrier Guidelines, BA-NY is required to provide pre-

ordering responses of less than or equal to BA-NY's retail response times plus 4 seconds, which

generally requires response times under 5 seconds. While BA-NY claims to be meeting this

standard for unparsed CSRs, Miller & Jordan Decl. ¶ 32, MCI WorldCom is experiencing

substantially longer intervals of between 15 and 20 seconds for parsed CSRs. This is

unacceptable.

63.   As discussed above, MCI WorldCom depends on the CSR for the

customer's basic ordering information, and, without a parsed CSR, MCI WorldCom cannot

eliminate the need for manual intervention between its pre-ordering and ordering processes. BA-NY has proposed to provide parsed CSRs at an average of "parity plus 10 seconds," to be measured using simulated transactions by robot. This proposal is inadequate. Since there is no retail analogue for the parsed CSR, BA-NY is not entitled to parity plus 10 seconds, but only to 10 seconds. In addition, because BA-NY's approach relies on the average response time, the times could vary up to 15 seconds. MCI WorldCom must be assured that it will receive parsed CSRs within 10 seconds, and, moreover, MCI WorldCom expects BA-NY to improve on these times in the future. In the interim, MCI WorldCom has proposed an absolute standard of 95% within 10 seconds, to be measured using actual performance times.

64.   Third, MCI WorldCom learned recently that BA-NY's parsed CSR capability is does not cover all product and service orders. BA-NY cannot today provide parsed CSRs, for example, for ISDN orders. In all the months that MCI WorldCom has been working with BA-NY to implement the parsed CSR interface, the only limitation BA-NY ever mentioned was that it would not be providing parsed CSRs for complex business orders. BA-NY should provide the parsed CSR functionality as previously represented, without any new exceptions.

65.   Moreover, MCI WorldCom operations are hampered by a lack of application-to-application access for address validation. For customers migrating from BA-NY, MCI WorldCom obtains their valid service addresses from their CSRs. New customers, however, do not have CSRs, so MCI WorldCom must validate their service addresses

independently.[8/] Despite the importance of validating addresses, MCI WorldCom does not do so

for new customers today. In order to avoid the delays and problems associated with using the

GUI, MCI WorldCom relies on a special software that validates the addresses using listings from

the post office, rather than actual service addresses. While far from ideal, this approach at least

avoids having to use the GUI.

66.   Unfortunately, MCI WorldCom has no alternative but to use the GUI to

reserve telephone numbers for these new customers. The way this is done today is that the MCI

WorldCom sales representative puts the customer on hold while he contacts a second MCI

WorldCom representative who is trained on the GUI, and the second representative accesses the

GUI and reserves the telephone number. The original sales representative then keys the number

into MCI WorldCom's systems, returns to the customer, and completes the pre-ordering process.

MCI WorldCom could not sustain a significant increase its customer base for long with such

splintered and manually intensive processes.

67.   Even assuming MCI WorldCom is able to implement BA-NY's address

validation function via EDI, that functionality is deficient in at least one important respect: BA-

NY's new address validation function does not provide partial address matching capability. With

partial address matching, which BA-NY's systems supported previously, a CLEC submits a

partial address to BA-NY, and BA-NY returns several candidates for the customer's address.

This is an important capability, especially for validating new customer addresses.

8/   Between ** **REDACTED** ** and ** **REDACTED** ** percent of MCI WorldCom's
UNE-platform residential customers are migrations from BA-NY. The other ** **REDACTED**
** to ** **REDACTED** ** percent are new orders for service.

68.   The lack of an application-to-application interface for pre-ordering also

makes it difficult for MCI WorldCom to obtain due date information. MCI WorldCom's access

to BA-NY's SMARTSCLOCK scheduling system is limited to the GUI. Making matters worse,

BA-NY does not permit a CLEC to reserve due dates at all. The CLEC may only view the times

currently available on the SMARTSCLOCK calendar. The due dates are reserved on a first-

come, first-served basis as the orders are received. This means that every minute the CLEC is

delayed dealing with the GUI, rekeying information, increases the chance that the selected due

date will not be available when the order finally reaches BA-NY. In order to avoid these

problems, MCI WorldCom does not use SMARTSCLOCK today, but instead has simply

established a default due date of 4 days for migrations and 7 days for new orders for its UNE-

platform customers. While this is significantly longer than the 2-day interval guaranteed MCI

WorldCom in its interconnection agreement with BA-NY, MCI WorldCom has determined that

it is worth it to avoid using the GUI.

69.   MCI WorldCom also lacks application-to-application access to service and

feature information for the customer's switch. This, however, is not nearly as problematic for

MCI WorldCom. Because service and feature availability information is relatively static, MCI

WorldCom is able to down load the relevant switch information in bulk into its internal databases

and, thereby, integrate the service and feature subfunction into its OSS without an application-to-

application connection. Ideally, MCI WorldCom would have both bulk transfer and immediate

access to this information, but it has not proven to be a commercial necessity.

4. MCI WorldCom Should Have Application-to-Application Access to Eight Additional Subfunctions.

70.   In addition to the primary pre-ordering functions, a CLEC should have nondiscriminatory, application-to-application access to eight more subfunctions. While some of these eight subfunctions are not, strictly speaking, "pre-ordering" functions, they are important to providing complete customer service. The additional inquiries are as follows: directory listing information; xDSL Loop Qualification; Installation Status; Service Order Inquiry; Loop Qualification--Basic and Extended; Carrier Access Billing CSR; and Channel Facility Assignment.

71.   Directory Listing. The directory listing inquiry allows a CLEC access to the customer's directory listing as it appears in the ILEC's directory database. While the customer's CSR may have some of his directory listing information, a CLEC should be able to obtain the customer's complete listing information via an independent query.

72.   Installation Status. The installation status inquiry gives a CLEC the same capability as the ILEC to receive a report on the status of an order being provisioned. This inquiry serves two important functions. First, it enables the CLEC to respond quickly and accurately to customer questions regarding their service--an important capability for any local carrier. Second, it permits a CLEC to track the progress of all of its orders on a daily basis and, thereby, to catch problems or delays with order provisioning as early in the process as possible.

73.   Service Order Inquiry. The service order inquiry provides the CLEC with a copy of the service order as received and processed by the ILEC. As with the installation status

-33-

subfunction, the service order query serves two functions. It allows the CLEC to confirm the accuracy of the order if a customer calls or simply as part of a standard quality assurance check.

74. xDSL Loop Qualification. Different types of Digital Subscriber Line ("xDSL") service require different loop specifications (i.e., loop length, resistance, the absence of bridge taps and load coils, etc.). See Guariglia Decl. ¶ 10 (discussing xDSL and loop qualification information). In order, therefore, to confirm for a customer whether that customer's loop is qualified for xDSL service, the CLEC must have access to the ILEC's xDSL loop qualification information.

75. Loop Qualification--Basic and Extended. Some enhanced services, like ISDN, require that the local network have extended (as opposed to basic) signaling capabilities. In order, therefore, to determine whether a particular customer's loop is qualified for a particular enhanced service, the CLEC must have access to the ILEC's basic and extended loop qualification information.

76. Carrier Access Billing CSR. In New York, once a customer migrates from BA-NY to a CLEC, BA-NY transfers that customers CSR information from its CRIS system to its Carrier Access Billing System. Thus, in order to ensure that BA-NY's records accurately reflect the status of the customer, a CLEC must be able to access BA-NY's migrated customer records.

77. Channel Facility Assignment. Also in New York, the channel facility assignment identifies the precise point of interconnection between the CLEC and BA-NY for a

specific unbundled loop customer. If there are problems on a customer's line, the CLEC must be able to report not only the customer but the customer's channel facility assignment.

78.   Today, MCI WorldCom does not have application-to-application access to any of these additional subfunctions. As a result, they cannot be integrated into MCI WorldCom's systems, forcing MCI WorldCom to settle for workaround measures and second best sources of information.

79.   For directory listings, for instance, rather than using the GUI to access BA-NY's Automated Telephone Listing and Address System ("ATLAS"), MCI WorldCom representatives rely on the CSR for the customer's directory listing. While this works well enough most of time, the listing on the CSR is not necessarily the same as the listing in the directory, thus inviting error in directory listing change orders.

80.   For installation status queries and service order inquiries, on the other hand, MCI WorldCom cannot ignore its customers' questions, so it must resort to the GUI. While this may suffice for individual customer questions in the short-term, MCI WorldCom has no way to run automatic installation status and service order inquiry checks on its orders with the GUI that it could with an application-to-application pre-ordering interface.

81.   Lack of integration also causes problems for the loop qualification subfunctions--xDSL, basic, and extended. Unbundled loop orders are not generally taken and placed while the customer is on the line, so speed is less important than accuracy. For these subfunctions, the capability to pre-populate loop orders with the loop qualification information is particularly critical. Loop qualification responses are so extensive and complicated that having

to retype the information manually introduces a significant risk of error. Even the most basic

loop qualification involves more than 30 fields of information, for example.[9]

82. Finally, MCI WorldCom would also prefer to be able to pre-populate its

repair and maintenance trouble tickets with the channel facility assignment information without

having to manually rekey the information. BA-NY used to provide this functionality, but,

contrary to BA-NY's agreements in the OSS Collaboratives, it was eliminated without advance

notice in March 1999.

5. BA-NY Is Responsible for the Lack of an EDI Interface for Pre-Ordering.

83. BA-NY claims that it "implemented" the industry standard EDI-based

interface for pre-ordering in July 1998. Miller & Jordan Decl. ¶ 21. Moreover, according to BA-

NY, the interface fully satisfies the Commission's requirement that it permit CLECs to integrate

pre-ordering and ordering functions with their own systems. Id. ¶ 22. BA-NY's support for

these claims does not withstand scrutiny.

84. BA-NY's claim that it "implemented" an EDI-based interface for pre-

ordering in July 1998 is not accurate. Both MCI WorldCom and KPMG found that BA-NY's

systems were plainly not ready for production. See KPMG Final Report, at II-8. The only pre-

ordering functionality to which MCI WorldCom now enjoys application-to-application access is

parsed CSR. MCI WorldCom is working to implement limited address validation capability

before the end of the year, but whether it can be implemented remains to be seen.

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[9] Moreover, the xDSL loop qualification information BA-NY provides via the GUI today
is inadequate. See Guariglia Decl. ¶¶ 8-11.